

DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: 4/1/2022
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Cindy Johnson,

Plaintiff,

v.

First Reliance Standard Life Insurance
Company,

Defendant.

Case No. 1:22-cv-01255-AT

**Request for Extension of Rule 16(b)
Deadline**

Greetings Your Honor,

The present matter is a case that was originally filed in the District Court of Minnesota. Upon the insistence of Defendant's local counsel, the undersigned requested an order from the presiding judge to transfer the venue to the Southern District of New York, which was granted. Service was effected upon the Defendant within the State of New York on March 3, 2022. The original Complaint we filed with your court had the Case Number from the prior Minnesota Matter still upon it. Defendant has not filed an Answer or Notice of Appearance to our Complaint to date. However, Defense did make contact with the undersigned on March 28, 2022, whereupon they requested we amend our Complaint as described above before they would file their Answer. We have since corrected the Complaint and are currently requesting that you allow us to so amend. The necessary documents will be, or have already been filed in ECF today.

The matter at issue now is the deadline for the Rule 16(b) Proposed Joint Scheduling Order. The due date for this order is April 1, 2022. We are requesting that the parties be given an adjournment or extension of 30 day extension on this deadline so we may confer and produce a reasonably agreed upon document, as required in this Court's Rules of Practice.

We do not seek a default judgement at this time.

GRANTED.

SO ORDERED.

Dated: April 1, 2022
New York, New York



ANALISA TORRES
United States District Judge